

# Exhibit 1

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

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In re:

CITY OF DETROIT, MICHIGAN,

Debtor.

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Chapter 9

Case No. 13-53846

Hon. Steven W. Rhodes

**PROPOSED ORDER ALLOWING AN ADMINISTRATIVE EXPENSE CLAIM  
PURSUANT TO SECTION 503(B)(3)(F) OF THE BANKRUPTCY CODE**<sup>1</sup>

This matter having come before the Court on the Motion of the Official Retiree Committee of the City of Detroit (the “Committee”) seeking entry of an order (“Order”) (i) pursuant to section 503(b)(3)(F) of the Bankruptcy Code allowing the cost of procuring the Insurance Policy as an administrative expense claim and (ii) granting such other and further relief as the Court deems just and proper (the “Motion”); the Court having reviewed the Motion; and it appearing that this Court has jurisdiction to consider the Motion pursuant to 28 U.S.C. §§ 157 and 1334; and it appearing that venue of these cases and the Motion in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and it appearing that this matter is a core proceeding pursuant to 28 U.S.C. § 157(b); and this Court having determined that the relief requested in the Motion is in the best interests of the Committee, the City, and its creditors; and it appearing that proper and adequate notice of the Motion has been given and that no other or further notice is necessary; and after due deliberation thereon; and good and sufficient cause appearing therefor,

**IT IS HEREBY ORDERED THAT:**

1. The Motion is GRANTED.

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<sup>1</sup> Capitalized terms not defined herein shall have the meaning ascribed to them in the Motion.

2. The Policy Premium is hereby allowed as an administrative expense pursuant to section 503(b)(3)(F) of the Bankruptcy Code in the total amount of \$602,250 (of which \$250,000 is a refundable retention to be held in escrow) as requested by the Committee. The Court concludes that this amount is reasonable for the total amount of coverage. The amount of coverage was provided to the Debtor and to the Court in camera, and the Court concludes that the amount is reasonable.

3. Nothing herein shall diminish the qualified immunity under applicable law of the Committee or any Committee Member, or any of their respective agents, advisors or counsel.

4. This Court shall retain jurisdiction with respect to all matters arising from or relating to the interpretation of this Order.